

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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POULAT ALAYEV, Derivatively on behalf of  
UNPA GROUP LIMITED,

Civil Action No. 22-CV-1609

Plaintiffs,

-against-

ARKADY (ARIHAY) KAIKOV, ZHENISBEK  
BAKBERGEN, NIGARA KHIDOYATOVA,  
ANDRE STECKLER, STEWARTON LIMITED,  
and UNPA GROUP LIMITED,

Defendants.

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**NOTICE OF MOTION TO SET ASIDE DEFAULT PURSUANT TO FRCP 55(C)**

**PLEASE TAKE NOTICE** that upon the annexed motion and accompanying memorandum of law, the Defendant ARKADY (ARIHAY) KAIKOV through their attorneys, Alexander Kadochnikov, Esq., will move this Court before the Honorable U.S. District Judge LaShann DeArcy Hall at the United States District Court for the Eastern District of New York Court at 225 Cadman Plaza East, Brooklyn, NY, 11201, Courtroom – 4H North on September 29, 2022 at 9:30 a.m. or as soon thereafter as counsel can be heard, for an Order: (1) Pursuant to FRCP 55(c) and 60(b) – vacating the Clerk’s default entered on June 11, 2022 together with such other and further relief this Court deems just and proper

**PLEASE TAKE FURTHER NOTICE** Pursuant to FRCP 6(c)(2), any opposing affidavits must be served at least 7 days before the hearing, unless the court permits service at another time

Dated: August 29, 2022  
Kew Gardens, New York

/s/ Alexander Kadochnikov, Esq.  
**Shiryak, Bowman, Anderson, Gill & Kadochnikov, LLP**  
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